

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA)
Plaintiff,)
)
)
)
v.) Case No.: 2:19-cr-00013
)
)
GEORGIANNA A.M. GIAMPIETRO) Chief Judge Waverly D. Crenshaw, Jr.
Defendant.)
)

PRELIMINARY WITNESS LIST - Defense

Ms. Georgianna A.M. Giampietro, the defendant, through undersigned counsel, respectfully submits this Preliminary Witness List in advance of trial, which is currently scheduled for January 31, 2022.

1. **Ayman Jawad Al-Tamimi** (expert on the Syrian conflict). Mr. Jawad will testify about the concept of military jihad within Islam, and the recent developments of Islamic foreign fighters traveling to participate in regional conflicts as a perceived religious duty. Mr. Jawad will testify about the religious duties to participate in jihad and issues of debt. He will also testify about the charities operating within Syria, their methods of fundraising, and their reported and un-reported connections to terrorist organizations. He will also provide context and definitions of what terms and concepts mean in the context of the Syrian conflict, and particularly in the context of religiously motivated armed groups and their supporters. This testimony will be based on his academic research regarding the conflict and the groups participating in it. Mr. Jawad has been accepted previously as a government expert in the case of *US v. Musaibli* 2:18-cr-20495 Eastern District of Michigan.

2. **Richard Connor** (computer forensic expert). Mr. Connor will offer testimony regarding the Telegram app, including the use of the secret chat feature, including how it operates, and how it is perceived by users. He will specifically offer the opinion that a regular user would not perceive that the Telegram secret chat app would involve the destruction of documents. Mr. Connor will offer the opinion that the defendant's use of the Telegram app was consistent with normal usage of the app, with one exception, that the defendant on occasion would use the screen shot feature on her mobile device to create a photographic image of the conversations occurring in the secret chat. Mr. Connor will offer the opinion that there is no evidence that the defendant deleted any of these photos taken of conversations. Mr. Connor will also testify with regard to the defendant's alleged deletion of social media account. Specifically, Mr. Connor will testify that deletion of social media accounts is a common practice similar to changing one's phone number to prevent unwanted individuals from further communications. Mr. Connor will also serve as a foundational witness to documents recovered from the forensic images of the defendant's devices that have not been separately provided to the defendant.

Respectfully submitted this December 23, 2021.

By: /s/ Charles Swift
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 23rd day of December, 2021, I electronically filed the foregoing Defense Preliminary Witness List with the Clerk of the Court using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

By: /s/ Charles Swift

Charles D. Swift, *Pro Hac*

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